

Richard H. Wender, Esq. (RHW- 7324)
Rochelle R. Weisburg, Esq. of Counsel (RRW-6848)
Wender Law Group, PLLC
One Penn Plaza, Ste. 2527
New York, NY 10119
T-212-244-4111 x203
F-212-563-7108
Email: rickw@wenderlaw.com
www.wenderlaw.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Lehman Brothers Holdings Inc.,
Debtor.

Chapter 11
Case No.: 08-13555 (jmp)

Hon. James M. Peck

**OBJECTION TO ASSUMPTION AND ASSIGNMENT OF, AND AMOUNTS
NECESSARY TO CURE DEFAULTS UNDER CONTRACTS AND LEASES TO BE
ASSUMED AND ASSIGNED TO SUCESSFUL PURCHASER**

Hanover Moving & Storage Co. Inc. (“Hanover”), by and through their counsel, the Wender Law Group, PLLC respectfully submits its limited objection (the “Objection”) to Lehman Brothers Holdings Inc’s (the “Debtor”) Notice for the Assumption and Assignment of, and Amounts Necessary to Cure Defaults Under Contracts and Leases to Be Assumed and Assigned to Successful Purchaser (the “Assumption Notice”) by Lehman Brothers Inc. (“LBI”).

1. While Hanover does not object to the assumption and assignment of the agreements between Hanover and LBI, Hanover respectfully claims that the cure amounts as set forth in the Assumption Notice is incorrect.
2. Specifically, the pre-petition amounts outstanding are \$ 400,246.57.
3. In addition, for the post-petition period, it is respectfully noted that LBI has continued to utilize Hanover’s services and for the period commencing September 15th through

September 19, 2008 the outstanding amount is not less than \$ 39,592.90

4. Attached hereto as Exhibit "A" is a computer generated run of all amounts which remain outstanding as of September 19, 2008^a

DATED: New York, New York
September 19, 2008
At 3:00 P.M.

Wender Law Group, PLLC

By:/s/ Richard H. Wender
Richard H. Wender, Esq.
Rochelle R. Weisburg, Esq. Of Counsel
.1 Penn Plaza, Suite 2527
New York 10119
212-244-4111 x203

Counsel to Hanover Moving & Storage Co. Inc

^a Given that we only received a copy of this notice at 11:00 am on September 19, 2008, the numbers we are providing to this Court may not be exact and are subject to verification. Hanover reserves all rights, remedies and defenses with respect to issues of or concerning its contractual arrangements with LBI.